

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

In re:

SCOTT WAYNE SUMMEY,

Debtor.

Case No.: 18-11040-LRC
Chapter: 13

**RESPONSE TO DEBTOR'S MOTION TO SELL
RESIDENCE**

Lakeview Loan Servicing, LLC as serviced by M&T Bank (the "Secured Creditor"), by and through undersigned counsel, responds to the Debtor's Motion to Sell Residence (the "Motion") (Doc. No. 38) and in support thereof, Secured Creditor states as follows:

1. This case was commenced by the filing of a voluntary Chapter 13 petition on May 16, 2018 by Scott Wayne Summey, (the "Debtor").
2. Secured Creditor holds a mortgage lien against the Debtor's property located at 391 Mill Pond Xing, Unit A2, Carrollton, Georgia 30116 (the "Property").
3. The Debtor is seeking authority to sell the Property
4. Closing on the sale shall be completed within 30 days of the Secured Creditor's payoff quote. If such closing does not occur within said 30 days, Debtor is required to obtain a new payoff from Secured Creditor with a closing within 30 days of said new payoff quote.
5. The Secured Creditor's Lien will be released upon the agreed upon payoff is received and applied.
6. Secured Creditor reserves the right to supplement and/or amend this Response.

WHEREFORE, the Secured Creditor requests that the Court enter an order approving Debtor's Motion to with the additional language requested by Secured Creditor, and for such other and further relief as the Court deems just and proper.

McCalla Raymer Leibert Pierce, LLC

By:

/s/ Maria Tsagaris

Maria Tsagaris

GA Bar No. 140371

1544 Old Alabama Road

Roswell, GA 30076

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all parties on the list to receive e-mail notice/service for this case, via the Notice of Electronic Filing (which is incorporated herein by reference), and via U.S. Mail, First Class to Scott Wayne Summey, 391 Mill Pond Crossing Unit A2, Carrollton, GA 30116.

By: /s/ Maria Tsagaris
Maria Tsagaris

Date: June 14, 2022